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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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1214820 - R8 SDMS

Ref: 8EPR-SA

August 22, 2011

Mr. David Wilson  
Environmental Resources Management  
102 West 500 South  
Suite 650  
Sah Lake City, UT 84101-2334

SENT VIA E-MAIL and U.S. MAIL

RE: Site Development Work Plan for Former Vermiculite Intermountain Site

Dear Mr. Wilson:

Thank you for your e-mails dated June 9 and June 16, 2011, which contained a Response to Comments and revised Work Plan for a proposed construction project at a portion of the "Vermiculite Intermountain Site." The site is known to be contaminated with amphibole asbestos from historical operations at a vermiculite exfoliation plant and is now subject to an Environmental Covenant which sets forth requirements if the asphalt parking lot capping the site needs to be disturbed. One of the requirements is submitting a written work plan to EPA and UDEQ and receiving written approval from these agencies prior to beginning a project that will disturb the cap. EPA reviewed the first Work Plan dated June 2010, and EPA's comments were incorporated into a letter dated August 17, 2010, issued by Dale Urban at the Utah Department of Environmental Quality (UDEQ). EPA has now reviewed the revised Work Plan dated June 2011 and has provided comments in this letter that must be addressed prior to EPA approval of the Work Plan.

EPA has determined that the Work Plan still does not contain sufficient detail describing specific procedures including but not limited to decontamination, dust control, air monitoring, waste storage, transportation, and disposal. This comment was previously provided in the August 17, 2010, letter from Dale Urban, which reflected the views of both the UDEQ and the EPA. EPA supports redevelopment of the property and recently approved a work plan to conduct invasive activities on the other portion of the site which is owned by PacifiCorp. However, EPA cannot approve the ERM June 2011 Work Plan until procedures can be described more thoroughly which demonstrate that human health will be protected and there will be no release of asbestos fibers outside the property during the construction project. EPA recommends that either the Work Plan undergo extensive revision, or that individual work plans be prepared by the subcontractors who will be conducting the construction work and air

monitoring, including items such as a detailed work plan for construction activities, health and safety plans, and sampling plan for air monitoring.

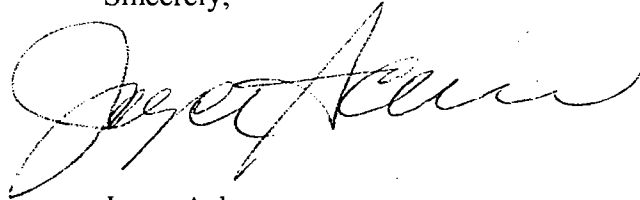
In addition to the above comment, EPA has the following comments to individual portions of the revised Work Plan:

1. Section 3.2 of the Work Plan continues to state that equipment operators will be inside enclosed cabs. As stated in the August 17, 2010, UDEQ letter, this does not prevent exposure to asbestos fibers.
2. Section 3.2 describing perimeter monitoring is unclear and does not address the comments in the August 17, 2010, UDEQ letter. Perimeter monitoring must be conducted daily, not weekly. The PEL is not relevant for perimeter monitoring to measure potential exposure to the public.
3. Section 3.3 - EPA supports the concept of using only clean fill in utility corridors to prevent exposure by workers to contaminated soils during maintenance work and preclude the need for trained asbestos workers to conduct the work. Similarly, EPA encourages the property developer to consider disposing of all contaminated soil disturbed during the project and providing a layer of clean fill under new structures to minimize the need for trained asbestos workers if the foundations of these structures need to be disturbed.
4. Section 4.1 and elsewhere – A sampling plan for air monitoring is required to be submitted and approved by EPA and UDEQ prior to approval of the Work Plan.
5. Section 4.5 – It is likely that EPA and UDEQ will be requesting copies of the daily construction reports, to be provided within 24 hours of request. This is mentioned in Section 4.6 but not Section 4.5.
6. Section 4.6 – New comment: Progress reports should be submitted weekly to EPA and UDEQ.

These comments do not constitute a review of compliance with state and federal asbestos regulations. In addition, the UDEQ may submit comments under separate cover and may have additional requirements or more stringent requirements.

Please do not hesitate to contact me with any questions regarding these comments at (303) 312-6822 or via e-mail. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joyce Ackerman".

Joyce Ackerman  
On-Scene Coordinator

Cc: Craig Bamitz, UDEQ Division of Environmental Response and Remediation  
Dale Urban, UDEQ Division of Environmental Response and Remediation  
Greg Sorenson, UDEQ Division of Air Quality  
Vicki Bennett, Director, Salt Lake City, Division of Sustainability and Environment  
Royal DeLegge, Director, Salt Lake Valley Health Department, Environmental Health

